

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SOLAS OLED LTD.,

Plaintiff,

v.

SAMSUNG DISPLAY CO., LTD., et al.,

Defendants.

Case No. 2:19-cv-00152-JRG

**DEFENDANTS SAMSUNG DISPLAY CO., LTD., SAMSUNG ELECTRONICS
CO., LTD., AND SAMSUNG ELECTRONICS AMERICA, INC.’S
NOTICE PURSUANT TO 35 U.S.C § 282**

Pursuant to 35 U.S.C. § 282, Defendants Samsung Display Co., Ltd., Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. (collectively, “Defendants”) hereby give notice to Plaintiff Solas OLED Ltd.’s (“Solas”) of the following patents and publications that may be relied on the show that the asserted claims of U.S. Patent No. 6,072,450 (the “’450 patent”); U.S. Patent No. 7,446,338 (the ’338 patent”); and U.S. Patent No. 9,256,311 (the “’311 patent”) (together, the “Asserted Patents”), are invalid or to show the state of the art.

The identification of a particular patent reference or publication does not mean that Defendants necessarily will introduce or rely on that patent or publication at trial, and is not an admission or representation that reliance upon such patent reference or publication is necessary to establish any of Defendants’ defenses or counterclaims.

I. PATENTS AND PATENT PUBLICATIONS

Country	Number	Date Issued/Published	Inventor
European	EP 1 331 666	11/26/2014	Yamazaki, <i>et al.</i>
International	WO 03/079441	9/25/2003	Childs, <i>et al.</i>
International	WO 03/079442	9/25/2003	Hector, <i>et al.</i>
International	WO 03/079449	9/25/2003	Young, <i>et al.</i>
International	WO 2010/090487	8/12/2010	Hwang
International	WO 2010/099132	9/2/2010	Moran, <i>et al.</i>
International	WO 2011/107665	9/9/2011	Brown, <i>et al.</i>
International	WO 96/25020	8/15/1996	Eida
Japan	JP H05-3079	1/8/1993	Manabe
Japan	JP 2003-216100	7/30/2003	Hiroshi
Japan	JP 2007072902	3/22/2007	Takashima
United States	4,356,429	10/26/1982	Tang, <i>et al.</i>
United States	4,539,507	9/3/1985	VanSlyke, <i>et al.</i>
United States	4,720,432	1/19/1988	VanSlyke, <i>et al.</i>
United States	4,944,836	7/31/1990	Beyer, <i>et al.</i>
United States	4,950,950	8/21/1990	Perry, <i>et al.</i>
United States	5,047,687	9/10/1991	VanSlyke, <i>et al.</i>
United States	5,059,861	10/22/1991	Littman, <i>et al.</i>
United States	5,061,569	10/29/1991	VanSlyke, <i>et al.</i>
United States	5,073,446	12/17/1991	Scozzafava, <i>et al.</i>
United States	5,150,006	9/22/1992	VanSlyke, <i>et al.</i>
United States	5,151,629	9/29/1992	VanSlyke
United States	5,276,380	1/4/1994	Tang
United States	5,294,870	3/15/1994	Tang, <i>et al.</i>
United States	5,302,966	4/12/1994	Stewart, <i>et al.</i>
United States	5,540,999	7/30/1996	Yamamoto, <i>et al.</i>
Japan	5638399	9/8/2011	Kuriki

Country	Number	Date Issued/Published	Inventor
United States	5,640,067	9/17/1997	Yamaguchi, <i>et al.</i>
United States	5,670,792	9/23/1997	Utsugi, <i>et al.</i>
United States	5,684,365	11/4/1997	Tang, <i>et al.</i>
United States	5,714,968	2/3/1998	Ikeda, <i>et al.</i>
United States	5,739,545	4/14/1998	Guha, <i>et al.</i>
United States	5,847,516	12/8/1998	Kishita, <i>et al.</i>
United States	5,952,779	9/14/1999	Arai, <i>et al.</i>
United States	6,011,529	1/4/2000	Ikeda, <i>et al.</i>
United States	6,157,356	12/5/2000	Troutman, <i>et al.</i>
United States	6,429,451	8/6/2002	Hung, <i>et al.</i>
United States	8,614,545	12/24/2013	Miyashita, <i>et al.</i>
United States	8,722,314	5/13/2014	Kuriki, <i>et al.</i>
United States	9,323,400	4/26/2016	Kim, <i>et al.</i>
United States	9,395,851	7/19/2016	Mikladal, <i>et al.</i>
United States	9,400,576	7/26/2016	Chen, <i>et al.</i>
United States	2002/0000576	1/3/2002	Inukai, <i>et al.</i>
United States	2002/0009538	1/24/2002	Arai, <i>et al.</i>
United States	2002/0158835	10/31/2002	Kobayashi, <i>et al.</i>
United States	2003/0127657	7/10/2003	Park, <i>et al.</i>
United States	2003/0137325	7/24/2003	Yamazaki
United States	2003/0151637	8/14/2003	Nakamura, <i>et al.</i>
United States	2004/0113873	6/17/2004	Shirasaki, <i>et al.</i>
United States	2004/0140758	7/22/2004	Raychaudhuri, <i>et al.</i>
United States	2004/0165003	8/26/2004	Shirasaki, <i>et al.</i>
United States	2008/0223708	9/18/2008	Joo, <i>et al.</i>
United States	2009/0219257	9/3/2009	Frey, <i>et al.</i>
United States	2009/0002337	1/1/2009	Chang
United States	2010/0045632	2/25/2010	Yilmaz, <i>et al.</i>

Country	Number	Date Issued/Published	Inventor
United States	2010/0103138	4/29/2010	Huang
United States	2010/0123670	5/20/2010	Philipp, <i>et al.</i>
United States	2010/0156840	6/24/2010	Frey
United States	2011/0253668	10/20/2011	Winoto, <i>et al.</i>
United States	2011/0254780	10/20/2011	Kim, <i>et al.</i>
United States	2011/0007011	1/13/2011	Mozdzyn
United States	2011/0102361	5/5/2011	Philipp
United States	2012/0111479	5/10/2012	Sung
United States	2012/0218219	8/20/2012	Rappoport

II. OTHER PUBLICATIONS

Description
Chihaya Adachi, et al., <i>Electroluminescent Mechanism of Organic Thin Film Devices</i> , Acta Polytechnica Scandinavica, Applied Physics Series 215, 215-218 (1990)
S.W. Amos, Principles of Transistor Circuits: Introduction and Guide to the Design of Amplifiers, Function Generators, Receivers and Digital Circuits 383, 387 (8th ed. 1994)
AMS IMPEX, <i>Projected Capacitive Touch Screen (PCT)</i> , http://www.amsimpe.com/products/capacitive-PCT-touchscreen.html (accessed July 31, 2020)
Atmel, Touch Sensors Design Guide (Sept. 2009)
Gary Barrett & Ryomei Omote, <i>Projected-Capacitive Touch Technology</i> , 3(10) J. Soc. of Info. Display 16, 16-21 (2010)
David J. Griffiths, Introduction to Electrodynamics 80-92 (4th ed. 2013)
Mark L. Hildner, Flexible Flat Panel Displays 285-312 (Gregory P. Crawford ed., 2005)
Liangbing Hu, et al., <i>Scalable Coating and Properties of Transparent, Flexible, Silver Nanowire Electrodes</i> , 4(5) ACS Nano 2955, 2955-2963 (2010)
Marc J. Madou, Fundamentals of Microfabrication and Nanotechnology (1st ed. 1997)
Marc J. Madou, Fundamentals of Microfabrication and Nanotechnology (3rd ed. 2012)
Jun Rekimoto, <i>SmartSkin: An Infrastructure for Freehand Manipulation on Interactive Surfaces</i> , CHI '02, Proceedings of the SIGCHI Conference on Human Factors in Computing Systems (Apr. 2002)

Description
Takatoshi Tsujimura, OLED Display Fundamentals and Applications, 69-103 (Anthony C. Lowe ed. 2012)
Tetsuo Tsutsui, et al., <i>Significance of Multilayer Structures in Organic Thin-Film Electroluminescent Devices</i> , 1910 Proceedings SPIE 180, 180-189 (1993)
Geoff Walker, <i>A review of technologies for sensing contact location on the surface of a display</i> , 20(8) J. Soc. of Info. Display 413, 413-440 (2012)
Chung-chih Wu, Light-Emitting Devices Based on Doped Polymer Thin Films (Nov. 1997) (unpublished Ph.D. dissertation, Princeton University) (on file with the Princeton Dep't of Electrical Engineering)

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, on September 1, 2020, the foregoing document was filed with the Clerk of the Court using CM/ECF and that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system accordingly.

/s/ Melissa R. Smith

Melissa R. Smith